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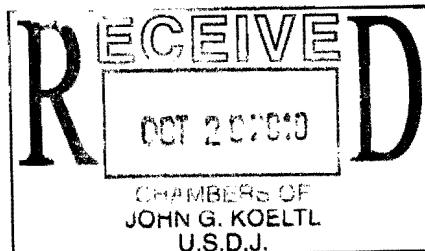
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DATE FILED: 10/29/10

October 29, 2010

VIA FACSIMILE (212) 805-7912

United States District Court-Southern District of New York
500 Pearl Street, Court Room 12B
New York, New York 10007
Attn: The Honorable John G. Koeltl



Re: Ford v. Russian Federation
CIV: 09 CV 1646
Our File No. : 5003.001

APPLICATION GRANTED SO ORDERED

Dear Judge Koeltl:

10/29/10
John G. Koeltl, U.S.D.J.

Please allow this to serve as a joint request for the Court to extend its endorsed letter order of September 30, 2010 by thirty days to December 1, 2010 for the defendant to provide the settlement draft to the plaintiff or have the case restored to the calendar.

As the Court may recall, the parties agreed to settle this matter and the Russian Federation agreed to pay Ford Motor Company a confidential sum to resolve this case. To date, due to internal administrative issues the defendants have not issued the settlement check to the office of the undersigned.

Pursuant to my previous correspondence of September 30, 2010 to the Court, defense counsel had advised me that the process to issue the settlement draft was going through certain government procedures which was why the defendant asked for the previous thirty day extension to November 2, 2010. The plaintiff, while not pleased with the previous request, consented and thought that would be the final extension.

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The Honorable John G. Koeltl

October 29, 2010

RE: Ford v. Russian Federation

Yesterday, I was advised by defense counsel that the defendants may need up to an additional thirty day extension. Specifically, while a decree to allocate the settlement funds was approved, it still requires the signature of the Russian Prime Minister. Defense counsel expects that to take place sometime this week or next. After that occurs I have been advised that the settlement draft will be issued.

If the settlement draft is not received by December 1, 2010 the plaintiff will forward a letter to the Court requesting the case be restored and that a conference be scheduled.

Should you have any questions, or require anything further, please do not hesitate to contact the undersigned.

Very truly yours,

AARONSON RAPPAPORT FEINSTEIN & DEUTSCH, LLP



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